

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 0412177MLW

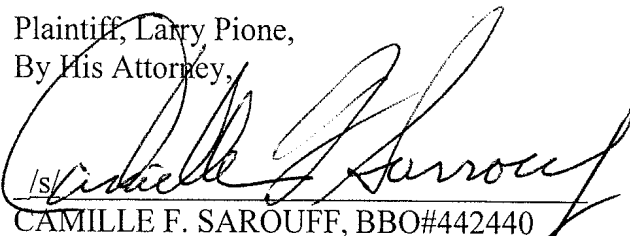
LARRY PIONE)
Plaintiff,)
)
v.)
)
THE MASSACHUSETTS PORT)
AUTHORITY,)
Defendant)

PLAINTIFF'S UNOPPOSED EMERGENCY MOTION TO PERMIT
LATE FILING OF PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

The plaintiff, Larry Pione respectfully requests that this Court consider its allowance of Plaintiff's Emergency Motion to Permit Late Filing of Plaintiff's Opposition to the Defendant, Motion For Summary Judgment. The plaintiff states that good cause exists for this motion. Plaintiff's attorney, Elise A. Brassil's trial schedule, motion schedule, family responsibilities and employment search, did not permit for an earlier response. Counsel for the defendant has no opposition to this Motion.

Kindly accept the late filing of this Opposition.

Plaintiff, Larry Pione,
By His Attorney,


/s/ Camille F. Sarouff

CAMILLE F. SAROUFF, BBO#442440
ELISE A. BRASSIL, ESQ., BBO#: 641411
SARROUF, TARRICONE & FLEMMING
95 COMMERCIAL WHARF
BOSTON, MA 02110
TEL.: (617) 227-5800

DATED: Aug 21, 2006

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

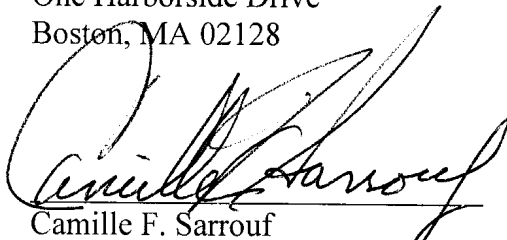
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LARRY PIONE)
Plaintiff,)
)
v.)
)
THE MASSACHUSETTS PORT)
AUTHORITY,)
Defendant)

CERTIFICATE OF SERVICE

I, Camille F. Sarrouf, hereby certify that I have served a copy of the within Plaintiff's Unopposed Emergency Motion to Permit Late Filing of Plaintiff's Opposition to Defendant's Motion for Summary Judgment and Plaintiff's Opposition to Defendant's Motion For Summary Judgment on all counsel of record listed below by electronic filing and hand delivery to:

William V. Hoch, Esq.
Massachusetts Port Authority
One Harborside Drive
Boston, MA 02128


Camille F. Sarrouf

Dated: *Aug 22, 2006*